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13 *Attorneys for Defendants,*
14 *ACCESS MEDICAL, LLC and*
15 *ROBERT "SONNY" WOOD*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 NAUTILUS INSURANCE COMPANY,

19 Case No.: 2:15-cv-00321-JAD-GWF

20 Plaintiff,

21 vs.

22 ACCESS MEDICAL, LLC; ROBERT
23 CLARK WOOD, II; FLOURNOY
24 MANAGEMENT, LLC; and DOES 1-10,
25 inclusive,

26 Defendants.

27 **SECOND MOTION AND PROPOSED ORDER**
28 **TO WITHDRAW AS COUNSEL OF RECORD**

29 MARTIN J. KRAVITZ, ESQ. and L. RENEE GREEN, ESQ., respectfully move this
30 court for an order permitting Martin J. Kravitz, Esq. and L. Renee Green, Esq. (Counsel) to
31 withdraw as counsel for Plaintiff, ROBERT "SONNY" WOOD, an individual, and ACCESS
32 MEDICAL, LLC, a Delaware Limited Liability Corporation.

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This Motion is made and based upon the Memorandum of Points and Authorities submitted herewith, Local Rule IA 11-6 and (e), the Declaration of Martin J. Kravitz, Esq. attached hereto, and the pleadings and papers on file herein.

DATED this 1st day of December, 2021.

KRAVITZ SCHNITZER JOHNSON
WATSON & ZEPPENFELD, CHTD.

By:/s/ Martin J. Kravitz, Esq.

MARTIN J. KRAVITZ, ESQ.
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Attorney for Defendants

DECLARATION OF MARTIN J. KRAVITZ, ESQ.

I, Martin J. Kravitz, hereby declare under penalty of perjury as follows:

1. I am Senior Partner in the law firm of Kravitz Schnitzer Johnson Watson & Zeppenfeld, Chtd., formerly known as Kravitz, Schnitzer & Johnson, Chtd.

2. I am knowledgeable about all matters set forth in this Declaration and know them to be true, except where stated upon information and belief, and in those instances I believe them to be true.

3. This firm has been co-counsel in this matter with Jordan P. Schnitzer, Esq., representing the Defendants, ROBERT “SONNY” WOOD, and ACCESS MEDICAL, LLC. When the Nevada Supreme Court accepted the Certified Question in late 2019 in Case No. 79130, it was our intent to disassociate as counsel in all of pending cases involving Mr. Wood and Access Medical. On January 21, 2020, a Stipulation of Change of Counsel to remove the Martin J. Kravitz, Esq. and L. Renee Green, Esq. was filed in the Nevada Supreme Court, and thereby relieving responsibility in that case.

4. In this matter, we have not communicated with Mr. Wood for approximately two (2) years. All work on behalf of Defendants have been handled solely by Jordan P. Schnitzer of The Schnitzer Law Firm.

5. L. Renee Green, Esq. has now left my firm. I hereby request the Court grant the Motion to Withdraw as Counsel for Defendants, and remove me and L. Renee Green from the service list.

6. The last known address for Mr. Wood and Access Medical, LLC is:

Robert "Sonny" Wood
4955 S. Durango Dr. Suite 180
Las Vegas, NV 89113

Access Medical, LLC
4955 S. Durango Dr. Suite 180
Las Vegas, NV 89113

7. There is no prejudice in granting this Motion to Withdraw as Defendants will continue to be represented by Jordan P. Schnitzer, Esq.

I declare under penalty of perjury the foregoing is true and correct.

DATED this 1st day of December, 2021.

/s/ Martin J. Kravitz
MARTIN J. KRAVITZ

MEMORANDUM OF POINTS AND AUTHORITIES

The United States District Court Local Rules IA 11-6 provides that an attorney may withdraw from representation of a client under certain circumstances. Specifically, Local Rule IA 11-6(b) states:

If an attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel. The affected client may, but is not required to, file a response to the attorney's motion within 14 days of the filing of the motion, unless the court orders otherwise.

Local Rule IA 11-6(e) further provides: "Except for good cause shown, no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case."

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1 Good cause exists to allow Martin J. Kravitz, Esq. and L. Renee Green, Esq. to withdraw
2 as *co-counsel* for Defendants as outlined in the Declaration of Martin J. Kravitz, Esq. There will
3 be no delay in the proceeding as Jordan P. Schnitzer, Esq. will remain counsel for Defendants.

4 **CONCLUSION**

5 Based upon the foregoing, Martin J. Kravitz, Esq. and L. Renee Green, Esq. respectfully
6 request that this Court grant their Motion to Withdraw as counsel for Defendants, ROBERT
7 “SONNY” WOOD, and ACCESS MEDICAL, LLC.

8 DATED this 1st day of December, 2021.

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10 KRAVITZ SCHNITZER JOHNSON
11 WATSON & ZEPPENFELD, CHTD.

12 By: /s/ Martin J. Kravitz, Esq.

13 MARTIN J. KRAVITZ, ESQ.
14 Nevada Bar No. 83
15 L. RENEE GREEN, ESQ.
16 Nevada Bar No. 12755
17 8985 So. Eastern Avenue, Suite 200
18 Las Vegas, Nevada 89123

19 **ORDER**

20 **IT IS SO ORDERED**

21 **DATED:** 10:28 am, December 02, 2021

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BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of December, 2021, pursuant to Local Rule 5.1, I serviced the foregoing **SECOND MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD**, via the Court's CM/EMF electronic filing system addressed to all parties on the e-service list and by mail, as follows:

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Robert "Sonny" Wood
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8550 W. Charleston Blvd.
Suite 102-355
Las Vegas, NV 89117

/s/ *Cynthia Lowe*

An employee of Kravitz Schnitzer Johnson
Watson & Zeppenfeld, Chtd.